

FILED 24 JUL 31 16:10 USDC-ORH

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
MEDFORD DIVISION

In re the Matter of J.P. and E.P.:

ARNAUD PARIS,

Petitioner,

and

HEIDI MARIE BROWN,

Respondent.

Civil Action No. 1:24-cv-00648-AA

**PETITIONER'S REQUEST FOR  
EXPEDITED HEARING UNDER  
ARTICLE 11 OF THE HAGUE  
CONVENTION AND LR 7-1(g) ON  
RESPONDENT'S MOTION TO  
DISMISS THIS HAGUE ACTION**

*Oral Argument and Evidentiary Hearing  
Requested Expeditiously under the Hague  
Convention Article 11 with Remote  
Appearance of Petitioner living in France*

Petitioner, Father, would like to ask that Respondent's motion to dismiss filed on May 28<sup>th</sup> be heard expeditiously under an evidentiary hearing to which Petitioner should be allowed to participate remotely from France as this Hague Action requires these proceedings to be expedited under the Article 11 of the Hague Convention which says:

*The judicial or administrative authorities of Contracting States shall act expeditiously in proceedings for the return of children.*

**PETITIONER'S REQUEST FOR EXPEDITED  
HEARING ON RESPONDENT'S MOTION**

1 *If the judicial or administrative authority concerned has not reached a decision*  
2 *within six weeks from the date of commencement of the proceedings, the applicant*  
3 *or the Central Authority of the requested State, on its own initiative or if asked by*  
4 *the Central Authority of the requesting State, shall have the right to request a*  
5 *statement of the reasons for the delay. If a reply is received by the Central Authority*  
6 *of the requested State, that Authority shall transmit the reply to the Central*  
7 *Authority of the requesting State, or to the applicant, as the case may be.*

8  
9  
10 Father filed this Hague Action on April 16th 2024, so more than 14 weeks ago, and LR 7-  
11 1(g) also provides authority for a party to request an expedited hearing if they believe that  
12 a prompt decision is necessary, which the attached letter from the Oregon psychologist  
13 Kathy Marshack supports. **See attached Exhibit 01, Letter from Kathy Marshack.**

14  
15 Furthermore the French Central Authority has advised Father to communicate this  
16 same letter from Kathy Marshack, an Oregon established psychologist, who is concerned  
17 about the mental well being of our children and the likely parental alienation on the part of  
18 their Mother, Respondent. Therefore Miss Marshack is advising and asking the Federal  
19 Court to act promptly to provide a welfare check on our children as well as a psychological  
20 evaluation of both our children and their mother, Respondent. See attached Exhibit 01.

21  
22 Father would like to also inform the court that to help facilitate the expeditiousness  
23 of this matter he recently obtained confirmation from Emmanuel Macron's French  
24 presidency office and from the French minister of Justice Éric Dupond-Moretti that France  
25

**PETITIONER'S REQUEST FOR EXPEDITED  
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1 is ready and willing to provide Honorable Judge Aiken with a letter under the article 15 of  
2 the Hague Convention regarding the wrongful nature of the removal of Eva and Juliette  
3 from French territory if Honorable Judge Aiken would like to receive that letter promptly  
4 from the French authorities as part of these Hague Proceedings.  
5

6 This letter under Article 15 would refer in part to the previously provided notice  
7 from the French criminal judge in charge of the abduction of Eva and Juliette Paris that  
8 Respondent, Miss Brown, conducted on French soil lasts April. This document from the  
9 Paris French Criminal Judge which had been previously provided to this court on June 21<sup>st</sup>  
10 under Exhibit 71 "*Notice to victim May 31<sup>st</sup>*" and that contained an error in its English  
11 translation. The corrected title of this notice is the following:  
12

13 ***"NOTICE TO VICTIM TO FILE AS A CIVIL PARTY IN A CRIMINAL ACTION"***

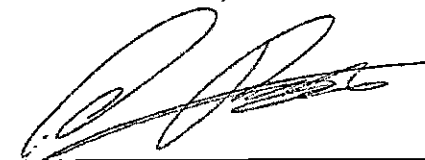
14 Instead of:

15 ***"NOTICE TO VICTIMS TO FILE CIVIL SUIT"***  
16

17 See attached Exhibit 02, corrected certified translation "*Notice to victim May 31<sup>st</sup>*".  
18

19 DATED this 31st day of July, 2024, in Paris, France

20 Submitted by:  
21 Arnaud PARIS, Pro Per

22 

23 13 rue Ferdinand Duval  
24 75004 Paris, FRANCE  
25 +33.6.88.28.36.41

**PETITIONER'S REQUEST FOR EXPEDITED  
HEARING ON RESPONDENT'S MOTION**

**VERIFICATION**

I, Arnaud Paris, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

SIGNED AND DATED this 31st day of July, 2024, in Paris, France.

A handwritten signature in black ink, appearing to read 'A. Paris', is written over a horizontal line.

Arnaud Paris

## CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PETITIONER'S REQUEST FOR EXPEDITED HEARING UNDER ARTICLE 11 OF THE HAGUE CONVENTION AND LR 7-1(g) ON RESPONDENT'S MOTION TO DISMISS THIS HAGUE ACTION** on the following party:

Katelyn Skinner at [kds@buckley-law.com](mailto:kds@buckley-law.com)  
Katrina Seipel at [kas@buckley-law.com](mailto:kas@buckley-law.com)  
Attorneys for Respondent

By the following method or methods:

\_\_\_\_\_ by **mailing** full, true, and correct copies thereof in sealed, first class postage prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.

X by **emailing** full, true, and correct copies thereof to the attorneys on record for Respondent shown above, which is the last known email address for the respondent's attorneys on the date set forth below.

\_\_\_\_\_ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s) shown above, which is the last known fax number for the attorney(s) office, on the date set forth below. The receiving fax machines were operating at the time of service and the transmission was properly completed.

\_\_\_\_\_ by selecting the individual(s) listed above as a service contact when preparing this electronic filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing system**.

DATED this 31st day of July, 2024, in Paris, France.

By:   
ARNAUD PARIS, Petitioner

ARNAUD PARIS  
13 rue Ferdinand Duval  
75004, PARIS, FRANCE  
Telephone: +33688283641  
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**PETITIONER'S REQUEST FOR EXPEDITED  
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